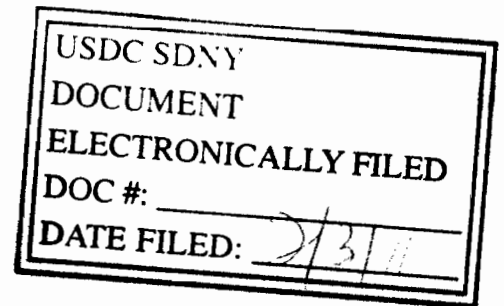


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February 2, 2011

BY HAND

Hon. Gabriel W. Gorenstein
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Subhas Chandra, MD v. Dep't of Surgery, Beth Israel Med. Ctr.
09 CV 6619 (RMB) (GWG)

Dear Judge Gorenstein:

I represent the Defendants in the above matter. With Plaintiff's consent, I submit the following joint proposed discovery schedule:

1. In light of the parties' pending settlement discussions and the settlement conference scheduled for March 1, 2011, and the parties' mutual desire not to incur discovery costs that may be avoidable, discovery is stayed until after the conference.
2. The parties shall exchange Rule 26 initial disclosures on March 10, 2011.
3. The parties shall serve their initial document demands and interrogatories on or before March 15, 2011.
4. The parties shall serve their responses to initial document demands and interrogatories on or before April 15, 2011.
5. The 7-hour deposition limit is waived as to (a) Plaintiff and (b) Defendant Dr. Leitman.

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6. The parties shall endeavor to schedule depositions on dates of mutual convenience for counsel and witnesses, giving due regard to the fact that some of the witnesses are surgeons with busy surgery schedules.

7. Non-expert discovery shall be concluded on October 14, 2011.

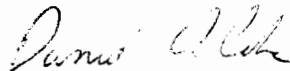
8. Expert disclosure, if any, as required by Rule 26(a)(2)(A) and (B) shall be concluded on or before November 14, 2011.

9. Disclosure of identities and reports of any opposing party solely to contradict or rebut previously-disclosed expert evidence shall be concluded on or before December 14, 2011.

10. Expert discovery shall conclude on January 18, 2012.

11. Summary judgment motions shall be made within 30 days after the conclusion of expert discovery. However, if neither party serves any Rule 26(a)(2)(A) and (B) expert disclosure, then summary judgment motions shall be made within 30 days after the last date for the latter disclosure.

Respectfully submitted,




Daniel A. Cohen

Attorney for Defendants

cc: Eric Tilton, Esq.
Attorney for Plaintiff
By fax and email

The within schedule is approved.

SO ORDERED:  DATE: 2/2/11
GABRIEL W. GORENSTEIN
UNITED STATES MAGISTRATE JUDGE